

GREATER LONDON AUTHORITY

Good Growth

Shane Baker

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Opportunity Areas
London Borough of Hounslow
Hounslow House, 7 Bath Road,
Hounslow, Middlesex
TW3 3EB

Our ref: GLA/6553/01
Your ref: 00505/H/P19
Date: 7 December 2020

Dear Shane

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Homebase, Syon Lane
Local Planning Authority reference: 00505/H/P19

I refer to the copy of the above planning application, which was received from you on 29 September 2020. On 7 December 2020, the Mayor considered a report on this proposal, reference GLA/6553/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not fully comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 90 of the above mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Lucy Simpson, e-mail LucySimpson@tfl.gov.uk

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Tony Arbour, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Duncan Matthews, Berkeley Group
Simon Roberts, WSP

Homebase, Syon Lane

in the London Borough of Hounslow
planning application no. 00505/H/P19

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Residential-led mixed use redevelopment comprising 473 residential units and a 10,550 sq.m. new replacement Tesco store, together with 137 sq.m. of flexible commercial floorspace and 200 sq.m. of flexible community use, with associated car parking, access, servicing, landscaping and plant, with building heights ranging from 4 to 17-storeys.

The applicant

The applicant is **St Edward** and the architect is **Patel Taylor**

Strategic issues summary

Principle of development: The comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area is strongly supported (paragraphs 21 to 26).

Housing and affordable housing: 38% affordable housing by habitable room, comprised entirely of London Affordable Rent accommodation. This is supported and complies with the criteria for the Fast Track Route. An early stage review mechanism is required, together with provisions requiring grant funding to be explored. The proposed London Affordable Rent units should be secured. The off-site play space provision should be detailed and agreed (paragraphs 27 to 34).

Urban design and heritage: The density, design and layout, residential quality and proposed height and massing is supported, subject to further information being provided to clarify the design constraints and further refinement of the architectural approach proposed for Block B. The application would cause less than substantial harm to the setting and significance of the Grade I listed Registered Syon Park, and to a lesser extent the Grade I Syon House. Less than substantial harm would also be caused to the setting and significance of the Grade II listed Former Gillette Factory and Syon Clinic. The overall cumulative harm caused to designated heritage assets could be outweighed by the proposed public benefits, subject to these being secured and detailed at Stage 2 (paragraphs 35 to 62).

Climate change: The energy, drainage and urban greening strategies are generally supported subject to further information being provided on the energy strategy (paragraph 63 to 66)

Transport: Further work is required on the modelling of highway options to ensure that a preferred option can be identified and agreed. A bus contribution of £1,700,000 is required for both development sites to mitigate the impact on bus capacity. Further detail on the public realm, site access and walking and cycling improvements is required to ensure these are safe and meet the requirements of the Healthy Streets. The retail car parking does not comply with the Intend to Publish London Plan. Measures are required to support strategic mode share targets. Further design information is required regarding cycle parking to demonstrate compliance with the LCDC (paragraph 67 to 86).

Recommendation

That Hounslow Council be advised that the application does not fully comply with the London Plan and the Intend to Publish London Plan, for the reasons set out in paragraph 90 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 29 September 2020, the Mayor of London received documents from the Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Mayor's Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's consideration in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the 2008 Order:

- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."*
- *Category 3F: "Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use."*

3 Once Hounslow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; to take over the application for determination himself; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website, www.london.gov.uk.

Site description

6 The site is located on the corner of Syon Lane and the A4 Great West Road at Gillette Corner within the Great West Corridor Opportunity Area. The site is approximately 1.4 hectares in size and is bounded by Syon Lane to the west; the A4 Great West Road to the north; a railway line and tree corridor to the south; and a car show room to the east. The site comprises a 4,180 sq.m. Homebase retail warehouse building, together with 295 surface car parking spaces located to the north and west of the building set behind a landscaped boundary. A loading and delivery area is located to the rear of the building, alongside a garden centre. Vehicle site access is on Syon Lane. Whilst the Homebase store continues to trade on a short-term basis, it has been earmarked for closure and has terminated its long-term lease.

7 The site itself is not designated or allocated for any use in the adopted Local Plan; however, Hounslow Council's Local Plan Review (2019) proposes that the site is allocated for residential, retail and B1 employment uses. In planning terms, the existing retail warehouse store constitutes an out of centre retail use. It is approximately 1 kilometre from Brentford Town Centre and over 2 kilometres from Hounslow Town Centre, which are the closest town centres.

8 The site has a Public Transport Access Level (PTAL) of 2 and 3, on a scale of 0 to 6b where 6b is the highest. Syon Lane National Rail station is approximately 100 metres from the site boundary to the south-west and is located on the other side of Syon Lane and accessed via a signal controlled pedestrian crossing. This station is served by Southern Western Railway services towards London Waterloo and Weybridge. Two different bus routes currently serve the site with bus stops available directly outside the site on Syon Lane and on the A4. Route H91 provides east-west connection along the A4 Great West Road between West Hounslow and Hammersmith and the H28 provides local service towards Hounslow East and Hayes and can be accessed on Syon Lane. TfL is proposing to extend the E1 bus route to Osterley Tesco when the Elizabeth Line opens. The A4 Great West Road forms part of the Transport for London Road Network (TLRN). The A315 London Road, which is approximately 450m south of the site, forms part of the Strategic Road Network (SRN).

9 The site is not within a conservation area and does not include any Statutory listed buildings. There are a number of designated heritage assets both within close proximity to the site and in the wider surrounding area, with the A4 Great West Road home to a number of Art Deco buildings. To the north of the site is the Grade II listed Gillette factory was built in 1937 and includes Grade II listed lamp stands and lanterns located outside the front entrance. Also facing the site to the north is the Grade II listed former National Westminster Bank and a Grade II telephone kiosk on the A4. To the east of the site is the Grade II listed Syon Clinic, Westlink House and 991 Great West Road.

10 The wider surrounding context also includes a number of designated heritage assets and landscape areas. To the north-west, is Osterley Park, a Grade II* listed Registered Historic Park and Garden which includes the Grade I listed Osterley House and also falls within the Osterley Park Conservation Area. To the south, Syon Park is a Grade I Registered Historic Park which includes the Grade I listed Syon House and Grade I listed Gate Lodges and Grade II listed Riding School and Stables which all fall within the Isleworth Riverside Conservation Area. The Royal Botanic Gardens World Heritage Site is found further to the south-west on the other side of the River Thames. Old Dear Park is also found to the south of the River Thames and falls within the Old Dear Park Conservation Area. This stretch of the River Thames is also covered by the Hampton to Wandsworth Thames Policy Area. To the north-east, Boston Manor Park falls within the Grand Union Canal and Boston Manor Conservation Area and includes the Grade I Listed Boston Manor House. To the west is the Spring Grove Conservation Area.

11 The existing Homebase building was constructed in 1987, having been designed by Sir Nicholas Grimshaw. It features a prominent 33-metre tall metallic tower / pylon structure which holds up a column free roof. The building was previously subject to a listing application which rejected by the Department of Culture Media and Sport (DCMS) who issued a Certificate of Immunity from Listing, under Section 6 of the Listed Buildings and Conservation Area Act 1990 on 3 December 2019.

12 The surrounding area to the south and west is residential and comprises two and three storey suburban properties, with commercial, office and industrial land uses to the north and east along the A4 Great West Road. The Sky Campus is to the north and comprises a 14-hectare hub of broadcasting, television and media production activities which is accessed from Grant Way via a controlled gated entrance and falls within the wider Great West Road Strategic Industrial Location (SIL). The SIL extends to cover the Gillett Building and the industrial and commercial properties to the north of the Great West Road and along the southern side of the A4, to the west of Westlink House. The commercial properties to the west of the site at Syon Gate Way do not fall within SIL and comprise car dealers, small business units and Syon Clinic. The Hounslow Local Plan (2016) identifies the streets off Northumberland Avenue to the west as an 'Area of Special Character'. Planning permission has been granted for a six storey building in B1 office and B8 self-storage use on the facing corner site on Syon Lane/the A4 Great West Road. In terms of topography, the site slopes from the Great West Road to the north down towards the site's southern boundary with the railway line, with a 4-metre change in levels from the north-west corner of the site to the southern boundary of the site.

Proposed development

13 The applicant is seeking full planning permission to demolish and redevelop the existing site to construct a residential-led mixed use scheme comprising 473 residential units and a 10,550 sq.m. new replacement Tesco store, together with a 137 sq.m. of flexible commercial unit and 200 sq.m. of community use, with associated car parking, access, servicing, landscaping and plant, with building heights ranging from 4 to 17-storeys.

14 The new Tesco store would be provided at ground floor level fronting the Great West Road with servicing and back of house uses located to the southern and eastern site boundary. The Tesco store would be served by 400 customer car parking spaces, which would be located within a two-storey internal car park which would sit above the Tesco store, including a 100 residential car parking spaces. The existing vehicle access on Syon Lane would be retained, with a ramp access route provided to the raised car park, which would also include residential car parking and cycle parking. Residential accommodation would be provided on the upper floors within five blocks with raised open communal amenity space provided at podium level (above the car park) at level 04. The residential blocks would vary in height from 6 to 17 storeys, with the taller elements located adjacent to the site's eastern boundary. The small commercial unit would be on Syon Lane with the community facility located at first floor level overlooking the junction corner. Public realm and landscaping improvements are proposed immediately adjacent to the site along Syon Lane and the Great West Road. The illustrative layout, height and massing is shown below.

Figure 1 – Proposed layout and massing

Buildings A and B fronting the A4 Great West Road



Background and context

15 The application forms part of a wider linked development proposal for the comprehensive redevelopment of both the Homebase and Tesco Extra sites on Syon Lane which are both being brought forwards by St Edward via separate planning applications which were submitted at the same time and have been subject to concurrent pre-application discussions. The Tesco Extra supermarket site on Syon Lane which is 260 metres to the north as shown below. In combination, the proposals would see the existing Tesco Extra store relocated to the Homebase site as part of this application, thereby enabling the delivery of a comprehensive residential-led redevelopment of the existing Tesco Extra store. The application at the existing Tesco Extra site in in outline form and proposes up to 1,677 homes (of which 35% would be affordable by habitable room), together with between 3,000 and 5,000 sq.m. of flexible non-residential floorspace, together with public and communal open space, a mobility hub, associated access, bus turning, car and cycle parking, and landscaping, with building heights ranging from 2 to 17-storeys (LPA Ref: 01106/B/P137; GLA Ref: 6554/01). In terms of phasing, subject to planning permission being granted on both sites, the applicant would deliver this scheme on the Homebase site first and once this development has been completed and the replacement Tesco store is open, the existing Tesco Extra site would be redeveloped. This approach would ensure continuity of trading for Tesco.



Case history

16 A formal GLA pre-application meeting was held with the applicant and GLA and Hounslow officers on 19 September 2019 regarding broadly similar residential-led mixed use redevelopment proposal, which proposed 500 residential units (35% affordable housing), 10,700 sq.m. of retail floorspace, including a new Tesco store, together with 400 customer car parking spaces and residential car parking at approximately 0.25 spaces per residential unit, with building heights ranging from 4 to 16-storeys. The GLA's formal pre-application advice note strongly supported the principle of the mixed use redevelopment and considered the application to be eligible for the Fast Track Route, subject to further details being provided in relation to the tenure split. Whilst the residential quality of the proposals was generally supported, further detail and discussion is required to confirm that the provision of dual aspect units has been maximised and that the proposed north-west facing single aspect units are of an acceptable quality. The proposed density, layout, design and massing of the scheme was supported, subject to the fuller assessment of the townscape, heritage and visual impact of the scheme. The applicant was encouraged to undertake a design review. Further information was required to set out the play space requirements and on-site provision.

17 In terms of transport, whilst the significant reduction in retail parking was welcomed, it was noted that the proposals do not accord with the draft London Plan. Notwithstanding this, given the location and PTAL of the site, the existing car parking provision and the significant reduction proposed, GLA officers considered that an appropriate degree of flexibility would apply in this particular instance and taking into account the wider public benefits that the relocation of the Tesco store would provide by unlocking the potential delivery of up to 2,000 new homes across both sites, of which 35% would be affordable. The quantum of residential car parking proposed was acceptable. The development was required to TfL's emerging scheme to improve road safety and pedestrian and cycle facilities at Gillette Corner given the importance of this route to the station and increase in pedestrian and cycle trips expected. Financial towards bus capacity improvements were also required

Strategic planning issues and relevant policies and guidance

18 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the Hounslow Local Plan (2015) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

19 The following are also relevant material considerations:

- The National Planning Policy Framework (2019)
- National Planning Practice Guidance
- The Intend to Publish London Plan (December 2019)
- The Secretary of State's 13 March 2020 Directions issued under Section 337 of the Greater London Authority Act 1999 (as amended) to the extent that these are relevant to this particular application they have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.
- The Mayor's Affordable Housing & Viability SPG (2017)
- Hounslow Local Plan Review – Great West Corridor (Regulation 19 pre-Submission Consultation) July 2019
- Hounslow Local Plan Review – Site Allocations (Regulation 19 pre-Submission Consultation) July 2019
- Isleworth Riverside Conservation Area Appraisal (2002)
- Osterley Park Conservation Area Appraisal (October 2019)
- Grand Union Canal & Boston Manor Conservation Area Appraisal (April 2018)
- Spring Grove Conservation Area Appraisal (Jan 2020)

20 The relevant issues and corresponding strategic policies and guidance are as follows:

- *Land use principles* *London Plan; Intend to Publish London Plan; Town Centres SPG;*
- *Housing and affordable housing; play space* *London Plan; the Intend to Publish London Plan; London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy;*
- *Urban design and heritage* *London Plan; the Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- *Inclusive access* *London Plan; the Intend to Publish London Plan: Accessible London: Achieving an Inclusive Environment SPG;*
- *Climate change* *London Plan; the Intend to Publish London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- *Transport* *London Plan; the Intend to Publish London Plan; the Mayor's Transport Strategy;*

Principle of development

Emerging Local Plan context

21 Whilst the site is not currently allocated for housing or designated for a particular use in the adopted Hounslow Local Plan (2015), it is put forward as a site allocation for residential and mixed use development as part of Hounslow Council's Local Plan Review (2019). The Council's draft allocation envisages a mix of residential, retail and Class B1 office/ R&D use, including scope for a single large format retail store and a minimum of 340 homes. This would contribute towards the Council's wider aspiration to deliver 7,500 homes in the Great West Corridor between 2019 and 2034.

Opportunity Area context

22 The site is within the Great West Corridor Opportunity Area set out in the Intend to Publish London Plan, having been indicatively identified as having potential for opportunity area status in the 2016 London Plan. In line with London Plan Policy 2.13 and Policy SD1 of the Intend to Publish London Plan, the proposed development should optimise potential residential and non-residential development capacity, provide an appropriate mix of uses and support wider regeneration and the provision of mixed and inclusive communities, whilst also recognising the role of heritage in place making. The Intend to Publish London Plan sets the Opportunity Area an indicative capacity guideline for 7,500 homes and 14,000 jobs to 2041. The proposed development would respond positively to these broad policy objectives and would make a substantial contribution towards achieving the strategic planning aspirations in terms of housing delivery and place-making.

Housing supply

23 To meet housing targets, London Plan Policy 3.3 emphasises the particular importance of mixed use redevelopment of surplus commercial capacity. The need for existing out of town retail parks and associated surface car parks to make a substantial contribution towards meeting London's housing need is set out in Policies H1, SD7 and E9 of the Intend to Publish London Plan. The existing site is therefore considered highly appropriate for residential-led mixed use development. Accordingly, the proposed redevelopment of this existing low density out of town retail warehouse site and its associated surface car park would make a significant contribution to meeting local and strategic housing targets is strongly supported.

Retail floorspace

24 The scheme proposes more than double the quantum of existing retail floorspace on site. Under normal circumstances, this quantum of retail in this location would be contrary to the town centre first approach which is embedded in local, strategic and national planning policy. However, in this instance, the proposals would involve the relocation of the existing Tesco store, with the replacement store provided on this site, which would be slightly smaller than the existing supermarket. Overall, there would be a significant net reduction in the retail floorspace across both sites, as shown below. It should also be noted that the quantum of retail on the existing Tesco site has not been determined, so these figures have been based on the figures provided in the applicant's town centre use report. It is also worth noting that the outline application on Tesco seeks a maximum of 5,000 sq.m. of flexible non-residential use, which could cover a range of other town centre uses.

Table 1 – existing and proposed retail floorspace (sq.m.) GIA

	Existing	Proposed	Net change
Homebase site	4,180	10,550	+ 6,370
Tesco site	11,582	1,000	- 10,582
Total retail	15,762	11,500	- 4,212

25 The principle of the redevelopment of the existing Tesco Extra store to provide a replacement large-format retail store is supported by the emerging draft Great West Corridor Local Plan (2019). The applicant has undertaken an impact assessment and sequential site assessment. This considers the cumulative combined net impact of the two linked applications and concludes that there would be no adverse impacts on the nearby Hounslow Metropolitan Town Centre or the Brentford and Hanwell District Town Centres. The report also concludes that there are no suitable or available sequentially preferable sites for the new Tesco store. As such, whilst the proposals do not fully accord with the town centre first approach, GLA officers consider that the proposals are acceptable in terms of London Plan Policy 4.7 and Policy SD8.

Conclusion - Principle of development

26 To conclude, the principle of the comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area accords with the land use principles set out in the London Plan and Intend to Publish London Plan and is strongly supported.

Housing and affordable housing

Affordable housing, viability and tenure mix

27 London Plan Policies 3.11 and 3.12 and Policy H5 of the Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target for 50% of all new homes to be affordable. Policy H5 identifies a minimum threshold of 35% affordable housing (by habitable room), with a threshold of 50% applied to public sector owned sites and industrial sites where there is a net loss of industrial capacity. The application is subject to the 35% threshold for affordable housing, as the site comprises commercial land in retail use.

The Fast Track Route

28 To be eligible for the Mayor's Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. Applicants must also seek to maximise affordable housing provision above the relevant threshold through the use of grant funding and, where additional affordable housing is provided above the relevant affordable housing threshold, the tenure mix requirements are flexible, as set out in Policy H7. In addition, an Early Stage Review Mechanism would need to be secured via Section 106, which should normally be triggered should an agreed level of progress on implementation not be made within two years of the date on which planning permission was granted.

Tenure split

29 In terms of tenure split, Policy H6 of the Intend to Publish London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the borough. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, GLA officers understand that Hounslow Council's adopted Core Strategy (Policy SC2) requires a 60:40 tenure split between social/affordable rent and intermediate tenure housing. GLA officers also note that the Council's draft Great West Corridor Local Plan review (2019) proposes a tenure split of 70% London Affordable Rent and/or social rent and 30% intermediate housing.

The applicant's affordable housing proposals

30 The applicant's proposed housing mix by tenure is set out below and comprises 38% by habitable room (35% by unit), comprised entirely of London Affordable Rent. This complies with the criteria for the Fast Track Route. An early stage viability review mechanism should be secured, in accordance with Policy H5, together with provision for the applicant to fully explore grant funding to be incorporated to provide additional affordable housing beyond the baseline level of affordable housing.

Housing affordability

31 Policy H6 of the Intend to Publish London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. The provision of London Affordable Rent is strongly supported and should be secured via Section 106 agreement, with rents capped at the Mayor's LAR benchmarks and restrictions on service charges.

Housing mix

32 London Plan Policy 3.8 and Policy H10 of the Intend to Publish London Plan state that new development should generally consist of a range of unit sizes. Policy H10 sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of a site in relation to town centres and public transport access; and the requirement to optimise housing potential; and the relationship between new build housing supply and demand within the existing housing stock.

33 The applicant's proposed housing mix is set out below and comprises a good mix of different sized properties by tenure and unit size, with 65 family sized homes with either 3 and 4-bedrooms, which would equate to 14% of the overall housing provision, with 27% of the LAR homes being 3 and 4-bedroom sized units. This is acceptable, taking into account the density, land use, location, PTAL of the site.

Table 2 – proposed housing mix by tenure

	London Affordable Rent	Market	Total	%
1-bedroom	62	136	198	42%
2-bedroom	57	153	210	44%
3-bedroom	40	20	60	13%
4-bedroom	5	0	5	1%
Total	164	309	473	
3+ bedroom by tenure	27%	6%	14%	

Children's play space

33 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the Intend to Publish London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion.

34 Based on the proposed housing mix set out above, the GLA's play space calculator would estimate approximately 240 children, generating a requirement for approximately 2,400 sq.m of play space provision. The applicant is proposing to meet the requirement for play space provision on-site for children aged 0 to 12 years, with 1,896 sq.m. of play space provision accommodated within the Level 04 podium courtyard. GLA officers consider that this is acceptable given the site constraints. However, mitigation should be provided via financial contribution to improve play space provision for children aged 12+ within the surrounding area, in discussion with the Council. The landscape strategy envisages play space provision in the form of flexible informal and soft landscaping with natural play features, rather than any formal or equipped play provision. This is generally acceptable; however, the detailed design will require careful consideration to ensure that it does genuinely provide natural play opportunities for children. Further detailed landscape details should therefore be secured via condition.

Urban design

Design, layout, public realm and landscaping

35 London Plan Policies 7.1 to 7.5, together with Policies D1 to D3, D8 of the Intend to Publish London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles requiring the provision of a high quality public realm; convenient, welcoming and legible movement routes; emphasising the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and by optimising the permeability of sites.

36 The overall design strategy seeks to address the design constraints associated with the provision of a large footprint supermarket and its associated servicing and parking requirements by wrapping the three-story podium with a total of five residential buildings surrounding and sheltering an elevated landscaped communal courtyard which would be provided above the podium at Level 04. A primary communal residential core entrance is proposed on Syon Lane to the south west corner of the site. Four other secondary communal cores located on the Great West Road, Syon Gate Lane and Syon Gate Way. The main communal entrance on Syon Lane would provide a direct and more convenient route up onto the podium level communal gardens for residents arriving from the station and from the podium gardens residents would then be able to access all the communal cores serving each of the other residential blocks. This main communal entrance would be located a sufficient distance from the car park access point and is provided in the most appropriate location. In line with the GLA's pre-application advice, this key communal entrance on Syon Lane has been designed to be as legible and welcoming as possible and would be located next to a flexible commercial kiosk unit to provide further animation and overlooking along this route. A communal resident's facility comprising a gym, meeting rooms and a cinema would be located on the podium courtyard.

37 The landscaping proposals are of a high standard and would provide a good quality of outdoor communal amenity for residents, given the elevated nature of the proposed courtyard and the sheltering provided by the surrounding residential blocks. The spacing between blocks generally allows between 17 to 25 metres between the linear blocks ensuring direct sunlight into the courtyard. The applicant's daylight, sunlight and overshadowing assessment shows that 95% of the podium courtyard would receiving more than 2 hours of direct sunlight on 21 March, thereby achieving the recommended benchmark in the BRE guidelines. In line with GLA' pre-application advice, private terraces would be provided serving residential units at podium level in order to animate and overlook the communal gardens and ensure adequate privacy and ownership. Public realm and landscaping improvements are proposed along Syon Lane and at the entrance to the proposed Tesco on the A4 which are also strongly supported. A green wall is proposed on Syon Lane to further mitigate the potential visual impact of the proposed internal vehicle access and ramp, which is an acceptable design approach in this instance. The layout of blocks has also been arranged so as to shelter communal courtyard from noise issues associated with the site's location on the A4.

37 Overall, the proposed layout would in general ensure that dead frontages associated with the Tesco store, car park and servicing area are either raised and screened from view, or located to the rear of the site in order to reduce the potential impact on the public realm and overall design quality of the scheme. However, Syon Gate Way and Syon Gate Lane would include secondary communal residential core entrances but would be lacking in natural surveillance, adjacent to the employment site to the east and railway to the south. The need for this route is recognised, as is the difficulty in ensuring active frontages at ground floor level on this side of the scheme due to the Tesco store's footprint and back of house requirements. It is also recognised that residential units would be provided at Level 01 to provide some overlooking along this route, in the interests of designing out crime. However, this route will need to be carefully managed and designed to ensure that it provides a suitably safe and welcoming space, particularly after dark, in accordance with the objective to design out crime and also to ensure that back of house and servicing activities do not dominate. High quality materials, landscaping and lighting will therefore be required, together with an appropriate management arrangement. The communal residential cores on Syon Gate Lane and Syon Gate Way should therefore be as legible, well-lit and welcoming as possible.

38 In conclusion, GLA officers consider that the design, layout and landscaping approach is an appropriate response to the development constraints in this particular instance and that the scheme would accord with the above planning policies.

Residential quality

39 London Plan Policy 3.5, Policy D6 of the Intend to Publish London Plan and the Housing SPG (2016) seek high quality new housing provision. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing, as set out in Policy D4 of the Intend to Publish London Plan. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be adequately addressed and single aspect units that are north facing, contain three or more bedrooms, or are exposed to significant adverse noise impacts should normally be avoided. The 2016 Housing SPG also sets out benchmark unit per core per floor ratios. Private amenity space should normally be provided to serve upper floor flats in the form of balconies, unless there are exceptional circumstances which demonstrate that site constraints mean that balconies cannot be provided. Where is the case, the required quantum of compensatory floorspace should be provided within the dwelling as mitigation.

40 Having reviewed the plans, and sought further clarification from the applicant, GLA officers can confirm that 38% of the residential units are dual aspect. Whilst there are no directly north-facing single aspect units, there are a number of single aspect units which face north-west. These particular units are located in Blocks A, E, D and C and face onto the courtyard and, in the case of Block A, the Great West Road. To mitigate this, the scheme proposes the provision of semi-dual aspect / 'double-aspect' residential units, which would equate to approximately 27% of the total residential units in the scheme. These 'semi-dual' / double aspect units would benefit from the provision of a secondary glazed facade serving habitable rooms thereby providing an alternative outlook which is achieved by either projecting or recessing the elevations of the building. These design measures are supported as a means of addressing some of the downsides associated with single aspect units where their provision is unavoidable would enhance the outlook, daylight and potential sunlight enjoyed within these units.

41 GLA officers recognise that there are particular design and layout constraints in this instance which are associated with constructing residential blocks above a supermarket which mean that the provision and percentage of dual aspect units within the scheme and the unit per core per floor ratio is not at the level which would normally be expected on a typical high density residential perimeter block scheme. These layout constraints mean that the residential cores need to be located on the edges of the site (avoiding the supermarket below). In addition, the space constraints associated with the ground floor use and back of house activities limit the ability to provide multiple communal

cores down to ground floor level and this has a knock-on effect on the number of dual aspect units which can be accommodated. In terms of the orientation of single aspect units, this has also been partly affected by the need to reduce the daylight and sunlight impacts affecting existing residential properties on Syon Lane and to address noise and air quality issues, which has resulted the rotation of a number of the blocks to face north and south, which might also otherwise have been avoided were it not for these constraints. The scope to accommodate further dual aspect units within the scheme was subject to detailed discussion at pre-application stage and the underlying constraining factors in this instance are, on balance, accepted in this case. The applicant has stated that if the number of north-west facing single aspect units was reduced, the massing would need to be redistributed which would impact the daylight and sunlight achieve within the courtyard and have therefore concluded that the proposed layout and massing provides the most appropriate solution. GLA officers would welcome further information to demonstrate these particular design trade-offs.

42 The unit to core ratios per floor generally exceed the benchmark (8 units) in the 2016 Housing SPG, ranging from 9 to 10, although this is reduced at higher levels within the scheme. Given the unit per core ratio, it will be important that appropriate management arrangements are in place and appropriately secured to ensure the provision and maintenance of successful high density residential-led mixed use scheme.

43 The residential units proposed would comply with the minimum standards in the Intend to Publish London Plan in terms of private internal space and private outdoor amenity space. The applicant's noise and vibration assessment and modelling show that internal noise levels within units would meet the relevant British Standard and ensure an acceptable acoustic environment would be achieved during the day and night-time through passive measures such as high specification glazing and sound insulation. This is predicated on openable windows, although there would be a background mechanical ventilation system to assist with the risk of overheating.

44 The applicant's Air Quality Assessment shows that the current and predicted levels of concentration of air pollution in terms of NO₂ and PM₁₀ are shown to be within the relevant objective limit value levels. As a result, the applicant is not proposing standard balconies and openable windows with no specific form of mitigation such as winter gardens. This is acceptable.

45 The applicant's Daylight and Sunlight Assessment shows that the scheme would ensure an acceptable level of compliance with the BRE guidelines given the density and scale of the development proposed and the internal daylight and sunlight conditions within the proposed residential units would be broadly similar to other urban contexts, noting that the majority of residential units would be raised to Level 04 and above.

Density and design review

46 London Plan Policy 3.4 seeks to optimise housing density, with Policies D1 to D4 of the Intend to Publish London Plan placing greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Based on the approach recommended in the 2016 Housing SPG for estimating the density of a mixed use scheme such as this, GLA officers estimate that the net residential density of the scheme is 439 units per hectare. This takes calculates the density based on 77% of the site area, reflecting the ratio of non-residential uses within the scheme. The proposals therefore trigger the requirement for a design review, given the density and height.

47 The proposals have been subject to design review, which was undertaken by the Hounslow Design Review Panel on 20 September 2020. The scheme has also been subject to an iterative process of design scrutiny with planning and design officers at the GLA and Hounslow Council. As such, GLA officers consider that the scheme has been subject to sufficient levels of design scrutiny, in accordance with the above strategic planning policies. Overall, GLA officers consider that the site is suitable for a well-designed high density scheme, taking into account the site's size close proximity to Syon Lane station and the mixed use nature of the proposed scheme, which enables

residential uses to be raised significantly above the of the A4 Great West Road. Notwithstanding this, as with the Tesco Extra site, the success of any high density residential scheme will, however, depend on the potential to significantly improve the existing walking, cycling and public transport connections and address highways severance issues in what is a relatively car dominated junction on the A4 Great West Road.

Architectural and materials quality

48 In terms of the architectural approach, a number of distinct approaches are proposed in terms of the materials and architectural detailing. A curvaceous and rounded corner building is proposed to mark the junction corner and Great West Road which seek to draw on the Art Deco architectural and appearance of buildings along this route, providing a strong horizontal emphasis to the proposed facades and a combination of glazed blue brick and bronze and white coloured metal detailing and panelling. This responds positively to and would enhance the character of the area. The blocks to the rear and along Syon Lane would be more brick based, with a more vertical elevational gridded structure proposed in terms of the proposed facade design and massing and a distinct colour palate proposed for the various elevations and buildings, including a sprayed glazed brick effect along Syon Lane and horizontal red and white brick cladding. This would create a highly distinctive and visually interesting scheme. Views along Syon Lane show the approach proposed would create an attractive sequence of blocks framing the view of the Grade II listed Gillette Factory. However, a more visually cohesive visual and materials approach is recommended on the taller elements of Blocks B2 and B3 to enhance and soften the visual impact of this elevation in immediate and wider townscape views and to provide a more cohesive approach on this key elevation.

Height, massing and tall buildings

49 London Plan Policy 7.7 and Policy D9 of the Intend to Publish London Plan state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets.

50 In terms of the local planning policy context, the adopted Hounslow Local Plan Policy CC3 supports the principle of tall buildings being provided in identified locations, including specific sections of the A4 Golden Mile frontage, which will be identified in the Great West Corridor (GWC) Local Plan. A plan-led approach to the location of tall buildings is being undertaken as part of the Council's draft Great West Corridor Local Plan (2019) informed by a supporting Masterplan (2019) and the borough's Urban context and characterisation study (2014). Whilst the draft GWC Local Plan identifies the potential for a tall 'focal building' (between 40-50 metres AOD) adjacent to the Sky Campus, it does not specifically identify the Homebase site as suitable for tall buildings.

51 As shown in Figure 1 above, a number of tall buildings are proposed as part of the scheme. A 17-storey building would be located on the north-east corner of the site fronting the Great West Road. Two 15 storey buildings would also flank Syon Gate Lane, with a 10-storey linear block to the railway to the south, together with a stepped corner building proposed at the junction of Syon Lane and the Great West Road which would range in height from 6, 8, 10 and 12 storeys. This is a step-change compared to the existing site circumstances and the surrounding context. However, taking into account the site's key landmark location on the A4 Great West Corridor marking the entrance to the opportunity area and noting the generally well-considered massing strategy employed, GLA officers support the principle of tall buildings being provided on the site and the overall massing strategy proposed. This appropriately locates the tallest elements to the north-eastern corner of the site and ensures the heights are staggered and profiled in a way which responds positively to the setting of the Grade II listed Gillette building in views along Syon Lane in both directions. The layout and varied architectural design and materiality and the varied heights proposed would also ensure

that the development is not perceived as a wall of development but is instead read as a series of individually designed and well-articulated buildings creating a distinctive and strong development frontage and mark what is a key landmark corner location on the entrance into the opportunity area.

52 Taking into account the various assessments undertaken as part of the applicant's Environmental Statement in respect of wind, daylight, sunlight, overshadowing, GLA officers consider that the proposals would not give rise to unacceptable impacts on the surrounding public realm or residential properties in relation to wind microclimate or loss of daylight and sunlight, subject to the proposed mitigation measures being secured. Whilst there would be impacts in relation to designated heritage assets and views, these are considered in the following heritage section of this report, and could, on balance, be acceptable were it is demonstrated that the proposed public benefits secured clearly and convincingly outweigh the harm caused.

Heritage impact

53 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, Section 66 of the act states that all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development.

54 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' or total loss of the significance of a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal. In every case, great weight should be given to the conservation of heritage assets and any harm to the significance of a designated heritage asset should require clear and convincing justification.

55 London Plan Policy 7.8 and Policy HC1 of the Intend to Publish London Plan state that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 seeks to avoid harm where possible and encourages heritage impact to be considered early on in the design process.

56 The applicant has submitted a Heritage Statement and Townscape and Visual Impact Assessment (TVIA) as part of their planning application. The TVIA considers the visual impact of the proposed development on designated heritage assets and townscape and landscape views in the immediate and wider context, showing the existing baseline context, the proposed development, and a cumulative scenario (which includes the proposed redevelopment at the existing Tesco Extra site to the north). The TVIA has been undertaken at an appropriate time of year with representative views assessed in March when leaves on not on the majority of trees, thereby providing a 'worst case' assessment and additional summer views are provided for Syon Park to illustrate the visibility of the development in July when trees are in full foliage.

57 In terms of the impact on heritage assets in the nearby vicinity of the site, GLA officers consider that the application would significantly alter the setting of the Grade II listed former Gillet

Factory building when viewed in both directions along Syon Lane and when appreciated when passing the Gillet Corner on the Great West Road. However, as set out above, and demonstrated in Views 1 and 3 of the applicant's TVIA, the massing and architectural appearance of the scheme would appropriately celebrate and form a positive visual relationship with the Gillet Factory Tower. Notwithstanding this, the scheme would block views of much of the western flank of the landmark Grade II listed building from view when approaching from Syon Lane. As such, GLA officers consider the proposal would harm the setting and significance of the Grade II listed former Gillet Factory. For the reasons set out above, this would be on the lower end of the scale of less than substantial harm.

58 View 4 demonstrates that there would be a significant change to the setting of the Grade II listed Syon Clinic. The significance of this heritage asset is considered to be derived from the building's Art Deco architectural design and facade detailing as well as the historic and group value alongside other similar Art Deco buildings in this location. Its significance and heritage value is therefore mainly derived from its architectural design and appearance, rather than its immediate or wider setting. These more valuable elements of the building's significance would still be readily appreciated when passing along the Great West Road in the proposed views. GLA officers consider that the change to the setting of the building would cause less than substantial harm the setting and significance of the Grade II listed Syon Clinic. For the reasons set out above, GLA officers consider that this less than substantial harm would be at the lower end of the range of less than substantial harm.

56 Views 13, 14 and 15 of the applicant's TVIA are taken from Park Road in Syon Park and show that parts of the upper levels of the proposed tall buildings would be visible in long distance kinetic views across the Grade I listed Registered Historic Park, with the greatest impact on the initial approach into the park (View 15 and 14) and more visually limited glimpsed views of the upper section of one of the blocks visible at certain points in the breaks between the tree when stood directly outside the Grade I listed Gate Lodges. View 25, which is taken from entrance to Syon House itself shows that the corner section of one of the taller blocks would be visible rising above the tree line and Grade II listed former Riding House. All of the representative views are approximately 1 kilometre from the site, so elements of the development which are visible would be distant features in the skyline.

57 However, the significance of Syon Park as a Grade I listed landscape is high and its overall significance is to a large extent derived from the open and well-preserved character of the landscape setting which can still be appreciated in its original form and intended landscape design. Currently, only the tower of the Grade II listed former Gillet Factory are visible above the tree line. As such, GLA officers consider that the visibility of the buildings in the above kinetic views would alter the setting of the Grade I listed landscape would therefore cause harm, which GLA officers consider to be less than substantial. GLA officers note that the applicant's summer views assessment does demonstrate that the development would be largely screened from view in Views 13 and 14 given the mature and dense nature of the trees. However, the buildings would still be clearly visible in View 15 during all times of year. As such, in view of the factors set out above, GLA officers consider that the extent of less than substantial harm caused to the Grade I listed Syon Park would be medium on the range of less than substantial harm.

58 View 20 of the TVIA which is taken from Kew Gardens on the south bank of the Thames shows that the proposed development would not be visible in the backdrop of the Grade I listed Syon House in this key vista from with the Kew Gardens World Heritage Site. However, taking into account View 13 and 25 of the applicant's TVIA, GLA officers consider that application would cause harm to the wider setting of the Grade I listed Syon House and Gate Lodges, taking into account the importance of the wider landscape setting to the significance. However, given the visual impact on the buildings itself would be more limited, the harm caused this would be at the lower end of the range of less than substantial harm.

59 The TVIA demonstrates that this application would not be visible within any of the views identified from within the Grade II* Osterley Park, the Royal Botanic Kew Gardens World Heritage

Site, Old Dear Park Conservation Area or in views assessed from Boston Manor Park close to the Grade I Listed Boston Manor House. As such, GLA officers consider that this application would not cause any harm to these heritage assets, including the World Heritage Site.

Conclusion - heritage

60 To conclude in relation to harm to heritage assets, GLA officers consider that the application would cause less than substantial harm to the Grade I listed Registered Syon Park, Grade I listed Syon House, Grade II listed Former Gillet Factory and the Grade II listed Syon Clinic. This harm could be outweighed by the public benefits proposed, including in particular the provision of 473 homes of which 35% would be affordable, comprised entirely of London Affordable Rent units. Improvements to pedestrian and cycle connections across the A4 could also potential comprise a substantial public benefit should these be provided, fully agreed and secured. The site's linked status with the Tesco Extra site would also be a factor for consideration when assessing the overall cumulative public benefits and the cumulative harm to heritage, noting the impact of the proposals combined but also the overall contribution towards overall and affordable housing delivery in terms of delivering 2,000 homes (35% affordable).

Fire safety

61 In line with Policy D12 of the Intend to Publish London Plan, a fire statement has been prepared by a suitably qualified third-party fire assessor which covers the range of fire safety issues set out in Policy D12 of the Intend to Publish London Plan, including means of escape, access for emergency services, fire resistance and suppression. This is acceptable.

Inclusive access

62 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standards of accessibility and inclusive design. All new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings', as set out in London Plan Policy 3.8 and Policy D7 of the Mayor's Intend to Publish London Plan. The latter should generally be distributed across tenures and unit sizes and floors to provide housing choice. Based on the applicant's accommodation schedule and Design and Access Statement and Landscape Strategy, the application complies with these requirements, subject to details being secured by condition.

Climate Change

63 The applicant's proposed energy strategy would ensure a 36% reduction in CO₂ emissions over and above baseline Building Regulations requirements on the residential (domestic) element of the scheme, of which, 12% would be achieved through energy efficiency measures. The non-residential (non-domestic) element would achieve a 35% reduction in CO₂ emissions over and above baseline Building Regulations, of which, 24% would be achieved through energy efficiency measures. This complies with the minimum on-site targets for CO₂ emissions and energy efficiency performance which are set out in the Intend to Publish London Plan and London Plan.

64 The applicant's overheating assessment is acceptable and that the overheating issues identified could be addressed either by passive design features and natural ventilation or through the use of mechanical ventilation, This is acceptable in this particular instance, given the need to balance other planning policy requirements relating to noise and air quality in this location. The applicant's energy strategy proposes to supply heat from a site wide energy centre, with heat supplied to all the residential units by a combination of air source heat pumps and gas boilers. However, the supermarket store would be served by a separate stand-alone heating strategy (also via heat pumps) which requires further justification. The applicant should also provide a further update regarding their investigation and discussions relating to the potential to connect to the Sky Campus heat network. If this is not possible, provision should be made to future proof the scheme to enable connection of the

site to a wider district heat network. No renewable energy technologies eg solar panels are proposed, which has not been sufficiently justified, given that these could be combined with green / brown roofs. This requires further justification. Once the energy strategy is agreed, the remaining shortfall in CO₂ emissions should be secured, which is currently estimated at approximately £509,400.

Flood Risk and sustainable urban drainage

65 The site is located within Flood Zone 1 and generally has a very low risk of surface water flooding according to the Environment Agency flood risk maps; however, areas which are at a higher risk of surface flooding are present in Syon Lane, Syon Gate Way and within the subway under the Great West Road. A range of sustainable urban greening (SuDs) measures are proposed as part of the development including an underground tank below the northern half of the site with a total of 1,400 cubic metres of attenuation storage capacity. This would be sufficient to address the required surface run-off associated with a 100 year storm event, plus an allowance for climate change. A range of other above ground SuDs features proposed in the form of green/brown roofs at roof top level and podium level, tree planting and urban greening within the public realm which would also provide attenuation during storm events. This is acceptable and complies with the London Plan drainage hierarchy, taking into account the development constraints and building footprint in this instance. As such, the application complies with the relevant policies in the London Plan and Intend to Publish London Plan.

Urban greening

66 As set out above, a range of urban greening measures are proposed within the landscape strategy through well-landscaped podium gardens, green roofs a green wall on Syon Lane and urban greening and tree planting along this route and the Great West Road. The overall urban greening and landscape strategy is strongly supported and proposes high quality landscaping, with mature tree planting both within the public realm and communal gardens, underplanted by wildflower meadows, shrub planting and lawns. This maximises the potential for urban greening, taking into account the characteristics and density of the development. An urban greening factor assessment has been undertaken for the proposals which demonstrates that scheme would meet the Intend to Publish London Plan target. As such, the application complies with the London Plan and Intend to Publish London Plan policies relating to urban greening.

Transport

67 In line with Policy T1 of the Intend to Publish London Plan, developments within London should support the Mayor's modal shift targets set out in the London Transport Strategy, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75% and 90% in inner London.

Healthy streets

68 The proposed development will generate an increase in pedestrian and cycle trips to and from the site and the local area. Whilst the proposals include public realm improvements to all four frontages of the site, these improvements are largely confined to within the redline boundary. Further information is required on footway widths, together with a Pedestrian Comfort Level (PCL) assessment to ensure that pedestrian routes along Syon Lane between the Tesco Osterley site and the rail station can accommodate the existing and proposed pedestrian movements. In addition, further work is required to demonstrate that the proposed 'clean air route' via Syon Gate Way is safe for pedestrians and cyclists. It is proposed to continue the existing off-road cycle lane along the site's northern frontage but then merge this route back onto the main carriageway just before the stop lines at Gillette Corner. However, it is not clear why the cycle lane proposed does not run the full length of the site so that it is continuous with the existing off-road cycle lane east of the site. This requires further justification and discussion.

69 Whilst two of the highway options considered in the highways impact section below would improve pedestrian connections across the A4, the TA provides insufficient detail to clarify the improvements to pedestrian and cycle connections between the two development sites, and the local community. Any changes to the public highway associated with the proposed development will require the developer to enter into a section 278 Agreement under the Highways Act 1980, with TfL and/or Hounslow Council. Accident analysis identifies areas where safety improvements could be made. Given the developments will increase the number of pedestrian and cycle movements within the vicinity of the site, which has the potential to exacerbate the existing problems identified, TfL require a commitment to deliver these improvements.

Retail car parking

70 In total, the application proposed to provide 505 car parking spaces on site, of which, 400 spaces would serve the Tesco store and 100 spaces would be provided for the residential element, together with 3 visitor car parking spaces and 2 car club spaces. The proposed number of retail car parking spaces (400) exceeds the maximum standard in the Intend to Publish London Plan, which would only permit up to 141 retail spaces at this location. GLA officers do however recognise that the proposals comply with the maximum car parking standard in the current London Plan (2016), which would permit 422 spaces in this location, based on the floorspace proposed and site PTAL.

71 Compared to the existing Tesco Extra store which contains 625 car parking spaces, there would be a net reduction in retail car parking (-225 spaces). However, there is currently a significant over-provision of car parking on the Tesco Osterley site. This matter was discussed during pre-application stage and Tesco set out their position that they consider 400 spaces to be the required level of parking which they would accept as landowner on this particular site given its large function and taking into account current usage of the existing store and shopping patterns. In line with pre-application advice, occupancy surveys of the existing car park have been provided as part of the applicant's TA, show current occupancy levels ranging from 414 to 499 spaces.

72 Policy T6 of the Intend to Publish London Plan states that, where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Policy T6 does recognise that some flexibility may be applied where existing retail sites are redeveloped outside town centres in areas which are not well served by public transport, particularly in Outer London. Taking into account the site's Outer London location and current PTAL, GLA officers consider that an appropriate degree of flexibility could potentially apply in this instance when applying the maximum standard in the Intend to Publish London Plan. However, the current provision will not be effective in encouraging modal shift from car to sustainable modes as if car parking is provided at a level similar to current occupancy, there will inevitably be demand. Furthermore, free parking will not discourage those trips which could be made by sustainable means, and a charging mechanism should be agreed. It will also need to be demonstrated how the proposals support the strategic mode share targets (75% for walking, cycling and public transport) required for outer London in accordance with Policy T1 and T2 of the Intend to Publish London Plan. A further reduction in car parking provision should therefore be considered.

73 The potential for movement patterns and habits to change over time was discussed at pre-application stage and it was sufficiently demonstrated that the scheme is capable of adaption should the parking become redundant, with the size and dimension of the floorplan enabling change of use to office or other employment uses, which provides a welcome degree of flexibility over the longer term. As mitigation for the quantum of retail car parking proposed and to support the Mayor's aspiration for modal shift, GLA officers recommend that the Section 106 agreement should include a mechanism for the occupancy of the proposed retail car parking to be surveyed and assessed over the course of a 10-year period, with provision for any surplus / unused car parking spaces to be removed and replaced with alternative uses should the occupancy levels fall below an agreed level. A detailed parking management plan will be required to ensure that parking spaces are not used by residential units during the lifetime of the development. Rapid electric charging points should also be

provided, in accordance with Policy T6.3 of the Intend to Publish London Plan, as well as an increase in disabled car parking to serve the retail use. Parking charges for the retail car parking should be considered as a way of incentivising the use of sustainable transport.

74 To conclude, the application does not accord with the maximum retail parking standard in the Intend to Publish London Plan. However, GLA officers recognise that there would be an overall net reduction in parking provision based on the existing situation, as well as a number of other wider public benefits associated with the development. These wider public benefits include the delivery of approximately 2,000 residential units across both the Tesco and Homebase sites, of which 35% would be affordable housing, alongside the associated improvements in terms of public open space, public realm and walking and cycling, subject to these being secured by obligation. Furthermore, GLA officers are mindful that Tesco currently operate a viable store in this location, which includes a substantial amount of parking and as landowners, their consent is necessary to unlock the development of the two sites and enable the wider planning benefits set out above to be realised. Without their commercial agreement, it is unlikely that two schemes could come forward in the comprehensive manner that is proposed. As such, the non-compliance of the proposals with the Intend to Publish London Plan, will need to be balanced against other public benefits being secured and set out at Stage 2 for full consideration.

Residential car parking

75 The residential accommodation equates to a car parking ratio of 0.21 spaces per unit. The quantum of residential car parking provision complies with the maximum parking standard set out in the Intend to Publish London Plan for an Outer London Opportunity Area site such as this and is therefore acceptable. The scheme also proposes two car club spaces and 3 visitor car parking spaces to serve the residential element of the scheme. Of the 100 residential car parking proposed, 24 would be disabled car parking spaces which equates to 5% provision, which is acceptable. Electric Vehicle Charging Points (EVCP) including passive provision will be provided in accordance with Intend to Publish London Plan standards. A restriction is required to prevent future residents from obtaining a car parking permits in the surrounding existing Controlled Parking Zone (CPZ) or within any future CPZ in the area. This should be secured via Section 106 agreement, together with free car club membership for all new residents for a period of three years should be secured. Further work is required on the Car Parking Management Plan (CPMP) to detail how the retail car parking spaces will be managed and enforced.

Cycle parking

76 In terms of cycle parking, 204 spaces will be provided for the Tesco supermarket and 896 spaces for the residential element of the development. This complies with the quantitative minimum standards for cycle parking in the Intend to Publish London Plan. However, as required by Policy T5, cycle parking should be designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS) and further detailed information is required to demonstrate compliance with the LCDS in terms of the type of cycle parking spaces proposed (25% of long-stay cycle parking provided should be Sheffield stands), the number of spaces in each store and spacing widths to demonstrate that the number of spaces can be delivered within the cycle parking facilities proposed and demonstrate compliance with the design requirements set out in the LCDS. There should be sufficient space for cargo bikes to serve the retail use using short-stay cycle parking, which should be demonstrated.

77 In terms of the location of cycle parking, all of the long-stay residential cycle parking is located on the southern flank of the podium at lower ground floor level and Levels 01, 02 and 03, with long-stay retail cycle parking also located on this side of the building. Limited information is provided to set out how cyclists would access the stores and their journey from the cycle storage facilities down to street level. A single lift access appears to be proposed for all cyclists on Syon Gate Way; however, clarification should be provided to confirm this. Further details of the size and capacity of the cycle lift should also be provided to demonstrate that this is sufficient for the number of cycle trips expected in the Transport Assessment during peak hours. There is a concern that not

all residents or staff will be able to conveniently access all the provided cycle parking and consequently they will be deterred or prevented from cycling. The applicant should look to address this and provide further information to demonstrate compliance with the LCDS and Intend to Publish London Plan.

Vehicular site access

78 It is proposed to provide a new signal-controlled access, which will incorporate the existing Syon Lane staggered signal pedestrian crossing into the proposed site access junction signal timing operation. The access arrangement also includes a direct 'straight-across' signalised pedestrian facility at the site access arm of the junction. Further consideration of this layout is required to ensure it is as safe as possible for pedestrians and cyclists. Service vehicle access will be from Syon Gate Way. This also provides access to the proposed 33 residential parking spaces.

Trip generation and modal split

79 The overall trip generation assessment is broadly robust; however, the Transport Assessment (TA) does include some of the assumptions in the retail trip generation summary should be quantified, along with the consideration of trip attraction to a new retail store. Retail person trip generation is also required.

Highways impact and modelling

80 The proposed development is predicted to generate 430 two-way vehicle trips in the AM peak hour and 706 during the PM peak hour. This represents a net increase of 385 trips in the AM peak hour and 586 in the PM peak hour when compared to the use of the existing Homebase site. To test the impacts of the vehicle trips generated by both the Homebase and the Tesco Osterley sites, detailed junction modelling using VISSIM microsimulation modelling software has been undertaken. Three Options have been initially identified to mitigate the impacts of development traffic and to provide pedestrian and cycle improvements in line with Healthy Street approach, which are summarised below:

- Option 1 includes a new traffic signal control junction for the Homebase site and the addition of a second right turning lane on the A4 for traffic turning into Syon Lane (towards the application site) from the west. This option also includes the relocation of the existing bus stop layby on the A4 Great West Road (Westbound) further east to extend the cycle lane. Option 1 effectively facilitates vehicle access to the development site and provides only limited improvements for active travel, and for this reason is unlikely to be supported.
- Option 2 includes the same measures as Option 1 but includes a new at grade pedestrian crossing on the A4, to the east of Syon Lane, to replace the existing pedestrian underpass. It retains a double right turn from the A4 into Syon Lane North. It also creates a double right turn lane from the A4 to Syon Lane south which is achieved with minor carriageway widening on the south-western side of the Gillette Corner junction.
- Option 3 includes the same measures as Options 1 and 2 but and includes new signalised pedestrian crossings on Syon Lane, both north and south of the A4.

81 All three Options have progressed through the TfL VISSIM Modelling Audit Process (VMAP). However, some further work is required in terms of reporting - so that the true impact of each option is clearly understood, and a preferred option of the most suitable mitigation for the combined developments can be selected.

Bus capacity improvements

82 The redevelopment of the Homebase site is predicted to generate 183 two-way bus trips in the AM peak hour and 142 two-way trips in the PM peak hour. TfL have accessed the combined

uplift in demand based on pre-COVID capacity and conclude that additional buses would be required to accommodate the predicted level of demand generated by both sites. Financial contributions are sought for 5 years to allow for passenger demand to build up. The total contribution requested would therefore be £340,000 x 5 years which equates to £1,700,000 for both development sites.

Bus infrastructure

83 To accommodate the proposed off-road cycle lane along the site's northern frontage it is proposed to relocate the existing bus stop further east. TfL have agreed the principle of this relocation, as the bus stop would have needed to be moved when the E1 is extended to the existing Tesco site. However, the detailed design of the bus stop will still need to be agreed with TfL. Any costs associated with relocating the bus stop, including the provision of a new shelter, will need to be fully funded by the applicant.

Rail and London Underground infrastructure

84 Syon Lane Station and the trains which serve it are operated by South Western Railway (SWT). It will be for Network Rail and SWT to comment on the potential impact of the development on Syon Lane Station and the train services which operate through it. However, it is noted that Syon Lane Station is identified within the GWC Strategic Transport Study, as having existing capacity constraints during peak times. In terms of London Underground infrastructure, further analysis is required to assess the impact of predicted LU trips on station and line capacity.

Taxi drop off / pick up

85 There is no consideration in the TA as to where taxi/Private Hire Vehicles (PHV) may drop off and pick up. At the Tesco Osterley site, there is a taxi waiting area in the car park for pick up and drop offs. This might be beneficial in reducing the number of vehicles on site if a more convenient option like a taxi rank is included.

Delivery and servicing

86 A Framework Delivery and Servicing Plan (DSP) has been provided. Further work is required including an uplift in the predicted number of service vehicle trips which have been significantly underestimated.

Travel plan

87 Framework Workplace and Residential Travel Plans have been provided. In terms of the Workplace Travel Plan, there is little in the way of measures to encourage mode shift away from the private car for visitors nor are there any targets for mode shift for visitors. This should be addressed. The Travel Plans should be secured, enforced, monitored and reviewed by as part of the s106.

Local planning authority's position

88 Hounslow Council Planning Officers are reviewing the scheme and a Planning Committee date has not been confirmed.

Legal considerations

89 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; direct the Council under Article 6 of the Order to refuse the application; or take over the determination of the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

90 There are no financial considerations at this stage.

Conclusion

91 The London Plan and the Intend to Publish London Plan policies on retail and town centre uses; opportunity areas; housing supply; housing and affordable housing; play space; urban design; residential quality; density; tall buildings; heritage; inclusive design; energy; sustainable urban drainage; air quality; noise; urban greening; and transport are relevant to this application. The proposals are broadly supported but do not fully comply with the London Plan and the Intend to Publish London Plan, as set out below:

- **Principle of development:** The comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area accords with the land use principles set out in the London and Intend to Publish London Plan and is strongly supported.
- **Housing and affordable housing:** The applicant's proposed housing mix represents 38% by habitable room (35% by unit), comprised entirely of London Affordable Rent. This is supported and complies with the criteria for the Fast Track Route. An early stage review mechanism is required, together with provisions requiring grant funding to be explored. The proposed London Affordable Rent units should be secured. The off-site play space provision should be detailed and agreed and secured by S106 agreement.
- **Urban design:** The density, design and layout, residential quality and proposed height and massing is supported, subject to further information being provided to clarify the design constraints and trade-offs in terms of minimising single aspect units. Further refinement of the architectural approach proposed for Block B is recommended to mitigate the wide townscape and heritage impact.
- **Heritage:** The application would cause less than substantial harm to the setting and significance of the Grade I listed Registered Syon Park, and to a lesser extent the Grade I Syon House. Less than substantial harm would also be caused to the setting and significance of the Grade II listed Former Gillette Factory and Syon Clinic. The overall cumulative harm caused to designated heritage assets could be outweighed by the proposed public benefits, subject to these being secured and detailed at Stage 2.
- **Climate change:** The energy, drainage and urban greening strategies are generally supported subject to further information being provided on the energy strategy. Further information and justification is required regarding the absence of solar PV panels on the scheme. An update should also be provided prior to Stage 2 regarding the potential to connect to the Sky Campus heat network.
- **Transport:** Further work is required on the modelling of highway options to ensure that a preferred option can be identified and agreed. A bus contribution of £1,700,000 is required for both development sites to mitigate the impact on bus capacity. Further detail on the

public realm improvements and site access improvements are required to ensure that these are safe and meet the requirements of Healthy Streets. A Pedestrian Comfort Level assessment is required on Syon Lane. The pedestrian and cycle connections between the two development sites should be improved. The application does not accord with the maximum retail parking standard in the Intend to Publish London Plan. There should be a charging mechanism to discourage car use to support the achievement of strategic mode shift targets. Rapid electric charging points should also be provided, in accordance with Policy T6.3 of the Intend to Publish London Plan, as well as an increase in disabled car parking to serve the retail use, alongside an obligation to monitor the retail car parking occupancy levels over time. The residential car parking complies with the Intend to Publish London Plan. Further discussion and design detail is required regarding the long-stay cycle parking to ensure that the type of provision and its design and layout complies with the London Cycling Design Standards (LCDS) and is convenient for all users. Further details of the size and capacity of the cycle lift should also be provided to demonstrate that this is sufficient for the number of cycle trips expected in the Transport Assessment during peak hours. There should be sufficient space for cargo bikes to serve the retail use using short-stay cycle parking, which should be demonstrated.

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